

**IN THE UNITED STATES BANKRUPTCY COURT
OF THE SOUTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION**

IN RE:

Louis Magee

DEBTOR.

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CASE NO.: 17-01527

CHAPTER 13

MOTION TO APPROVE SETTLEMENT AND DISTRIBUTION

COMES NOW Debtor, Louis Magee, and respectfully represents as follows:

1. Debtor filed this Chapter 13 on April 22, 2017.
2. An application to Employ the firm Underwood and Reimer, PC, regarding an automobile accident was filed and approved on September 28, 2017 (Doc 43).
3. The parties to that lawsuit recently reached a settlement, which includes a lump sum payment to the debtor in the amount of \$12,000.00.
4. If approved, the attorney's fees of \$4,800 will be paid from the proceeds of the settlement pursuant to the approved contingency fee agreement.
5. NexClaim has asserted a medical lien in the amount of \$9,502.26, but has agreed to accept \$4,400.00 in full satisfaction of that lien.
6. In addition, BlueCross BlueShield has a lien of \$490.42, but has agreed to a 25% reduction and will accept \$376.82 in full satisfaction of that lien.
7. The debtor needs dental work and several crowns replaced, as a result of the accident and has estimated this to cost \$2,000.
8. The remainder will be remitted to the Trustee.

WHEREFORE, Debtor moves this Court for an order (1) approving the above-described settlement; (2) approve attorney's fees of \$4,800; (3) allow the debtor to retain \$2,000 for dental expenses, with the remainder to be paid to the Trustee to be distributed; and (4) other relief as justice requires.

Respectfully submitted this 16th day of October, 2018.

/s/ Earl P. Underwood, Jr.
Earl P. Underwood, Jr.
UNDERWOOD & RIEMER, PC
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Fairhope, Alabama 36532
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Email: epunderwood@alalaw.com

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been served upon the following by the United States Mail, postage prepaid and properly addressed or by electronic mail on October 16, 2018.

Wells Fargo Home Mortgage
7255 Bay Meadows Way
Des Moines, IA 50306

Civil Process Clerk
United States Attorney's Office
63 S. Royal St., Ste 600
Mobile, AL 36602

Green & Phillips
50 N Florida St.
Mobile, AL 36607

Internal Revenue Service
P.O. Box 7346
Philadelphia, PA 19101

Navy Federal Credit Union
1 Security Place

Merrifield, VA 22116

Shantrez Latrice Wright
7959 Cottage Hill Rd, Apt 1208
Mobile, AL 36606

Shantrez Latrice Wright
459 Pinehill Drive
Mobile, AL 36606

Sheffield Financial
PO BOX 1704
Clemmons, NC 27012

Synco/Lowes
P.O. Box 956005
Orlando, FL 32896

Synco/Walmart
P.O. Box 965024
Orlando, FL 32896

Ally Financial
PO BOX 380901
Minneapolis, MN 55438

Attorney General of the United States
Main Justice Building
950 Pennsylvania Ave.
Washington, DC 20530

Brcyls Bank
PO BOX 8803
Wilmington, DE 19899

Capital One
PO BOX 30281
Salt Lake City, UT 84130
BlueCross Blue Shield of Alabama
PO Box 361647
Hoover, AL 35236-1647

NexClaim Recoveries
75 Farmington Valley Drive
Plainville CT 06262

/s/ Earl P. Underwood, Jr.
Earl P. Underwood, Jr.